

EXHIBIT 15

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION**

**CONSOLIDATED INDUSTRIES, LLC
d/b/a WEATHER KING PORTABLE
BUILDINGS,**

Plaintiff,

v.

**JESSE A. MAUPIN, BARRY D.
HARRELL, ADRIAN S. HARROD,
LOGAN C. FEAGIN, STEPHANIE L.
GILLESPIE, RYAN E. BROWN, DANIEL
J. HERSHBERGER, BRIAN L. LASSEN,
ALEYNA LASSEN, and AMERICAN
BARN CO., LLC,**

Defendants.

Civil Action No. 1:22-cv-01230

**BARRY D. HARRELL'S FIRST SUPPLEMENTAL RESPONSES TO PLAINTIFF'S
FIRST SET OF INTERROGATORIES**

Barry D. Harrell, by and through his attorneys, states the following First Supplemental Responses to Plaintiff's First set of Interrogatories.

INTERROGATORIES

3. Identify each communication you have had with any person or entity (other than confidential communications solely with your legal counsel, your spouse, or your accountant) between January 1, 2021, and through the day of the termination of your employment with Weather King (including but not limited to communications with lenders or potential lenders, investors or potential investors, business partners or potential business partners, Weather King employees, Weather King contractors, Weather King dealers, Weather King builders, Weather King drivers, other Weather King business partners, rental companies, and Weather King customers) relating to

the communication, was a Weather King dealer, driver, customer, lender, landlord, rental company, or other business partner relating to your potential departure from Weather King and, with respect to each such communication: (a) describe in detail the substance of the communication; (b) identify all parties to the communication; (c) identify the date of the communication; and (d) identify the mode of the communication (*i.e.*, telephonic conversation, email, text message, etc.).

SUPPLEMENTAL RESPONSE:

Subject to and without waiving his objections, Harrell states that he had no such conversations.

6. Identify each person and/or entity with whom you have discussed funding, potential funding, or providing other financial support to or for any business enterprise in the Portable Business Industry since January 1, 2021, whether as an investor, a lender, or in any other capacity.

SUPPLEMENTAL RESPONSE:

Subject to and without waiving his previous objections, Harrell states that he had no such conversations.

7. Identify all then-current Weather King dealers to whom you suggested should demand a higher commission from Weather King, and with respect to each such dealer: (a) specify the date of the communication; (b) specify all parties to the communication; (c) specify the mode of the communication (*i.e.*, telephonic or text); (d) set forth the substance of the communication; and (e) identify all documents relating to the communication.

SUPPLEMENTAL RESPONSE:

Subject to and without waiving his previous objections, Harrell states that he had conversations verbally with the following dealers about the subject matter of this interrogatory: Triangle Barns and Okeechobee Storage Solutions.

Date: May 10, 2023

/s/ Thomas G. Pasternak
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